

**DEPARTMENT OF SOCIAL SERVICES**

744 P Street, Sacramento, California 95814



October 6, 2005

Mr. Eric M. Bost, Under Secretary  
United States Department of Agriculture (USDA)  
Food and Nutrition Service  
3101 Park Center Drive, Room 808  
Alexandria, Virginia 22301

Dear Mr. Bost:

Thank you for providing this opportunity to express our views regarding the upcoming Food Stamp reauthorization. The 2002 farm bill incorporated most of the reform recommendations, including simplifying eligibility, restoring benefits for noncitizens, reforming the quality control program, and establishing a new system of bonuses and transitional benefits. Even though the farm bill brought about positive change to simplify the program, the Food Stamp Program (FSP) remains a large, growing, complex, and highly structured program. It still requires more information, more verification and follow-up, and more frequent updates than any other comparable assistance program. These growing program demands require additional FSP streamlining and reform to reduce complexity and improve access. Simplification of the program continues to be a priority to ease administration difficulties. The following are our recommendations for the FSP:

Simplification:

- The eligibility and benefit determination process needs further simplification to reduce complexity that acts as a barrier to participation.
- The budget calculation process needs to be a much more streamlined process in particular with regard to income deductions.
- States should be allowed to use a standard shelter deduction that combines housing and utility expenses. The shelter allowance would be calculated by each state as currently is the case with the standard utility allowance. Handling of shelter expenses has historically been an error prone area of the program. This would be a positive change to ease the burden for those in need of assistance, as well as those involved with its administration.

Access and participation:

- Enhancement of benefits can increase access and participation.
- The minimum allotment should be increased to at least \$25 for all households. Categorically eligible households (one and two persons) should not be the only ones to have "guaranteed" benefits. The minimum benefit amount continues to be a major factor in low program participation especially for working households, the elderly and disabled.

Food Stamp Nutrition Education

- More flexibility should be allowed regarding the use of a comprehensive approach to social marketing in nutrition education efforts. A focused social marketing effort is necessary for nutrition education to FSP participants because it supports and brings about behavioral changes, and does not simply create awareness. Such marketing provides education through multiple disciplines to teach healthy eating and active living. Social marketing interventions reach FSP recipients and similar low-income households who may become program participants.
- There is a direct connection between nutrition education and outreach. The ability to improve a household's access to nutritious foods is a vital component in outreach efforts to increase participation in the FSP. The "firewall" that currently exists between the allowable funding for nutrition education versus outreach should be eliminated.

Performance measurement system:

- The threshold for citing a Quality Control (QC) error should be increased from \$25 to \$29 given that the food stamp benefit allotments have increased incrementally since federally fiscal year 2000.
- The QC under issuance errors should be eliminated from the federal sanction calculation that states are held liable.
- More time should be allowed for states to file for federal arbitration to resolve disagreements with the Food and Nutrition Service regarding QC case findings. Also, a faster response time is needed for those cases set for arbitration.
- Both active and negative QC case reviews dropped by states as incomplete or not subject to review and subsequently found by FNS to be reviewable or that there is enough information to complete the case should be returned to the state to complete and allow the state to ultimately make an eligibility determination.
- When a federal court decision enjoins a state to proceed in a way which impacts the FSP and results in QC errors, FNS should waive such errors.

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In closing, the FSP should be a program that focuses on providing assistance to low-income households in times of need in the most efficient way possible and without presenting unnecessary administrative barriers to participation. The upcoming reauthorization provides a perfect opportunity to effect needed change to make the program meaningful for the citizens of California and the nation. We look forward to working with USDA-FNS in partnership to shape this kind of effort.

Sincerely,

A handwritten signature in cursive script that reads "Charr Lee Metsker". The signature is written in dark ink and is positioned below the word "Sincerely,".

CHARR LEE METSKER  
Deputy Director  
Welfare-to-Work